

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

HENRY B. SARGENT,

Defendant.

Case No. 19-CV-11416 (WGY)

**AFFIDAVIT OF NATASHA ESKANDAR REGARDING
POST-VERDICT INTERVIEWS WITH MEMBERS OF THE JURY PANEL**

STATE OF NEW YORK)
) ss.
COUNTY OF NEW YORK)

NATASHA ESKANDAR, being sworn, states as follows:

1. I am a paralegal at Moskowitz & Book, LLP, counsel for defendant Henry B. Sargent in this action.
2. In light of the submission of the Securities and Exchange Commission on April 18, 2022, regarding my communications with certain jurors in the instant matter, I want to provide an accurate explanation of what occurred and thus offer this supplemental affidavit.
3. Rather than “contacting” any jurors, I simply went to the second floor of the United States Courthouse near the cafeteria following the return of the verdict, where I encountered several of the jurors individually. I made the same introduction to six jurors. I said precisely as follows: “Excuse me. My name is Natasha. You are under absolutely no obligation to speak with me but, if you don’t mind, I would like to hear your thoughts on what you thought was effective and ineffective” during the trial.

4. I never asked any questions about the deliberations or about any of the other jurors.
5. All but one of the six jurors were open to talking. I never was closer than 3 – 4 feet of any juror when I made the inquiry.
6. For the vast majority of each communication, the juror spoke and I listened. The only question I asked was whether there was anything that we could have explained more clearly and, in response to a couple of responses, I asked, “what did you find confusing”?
7. None of my conversations with individual jurors lasted longer than two or three minutes.

Signed under the penalties of perjury on this 18th day of April 2022.

MOSKOWITZ & BOOK, LLP



Natasha Eskandar
345 Seventh Avenue, 21st Floor
New York, New York 10001
(212) 221-7999
Attorneys for Defendant

Sworn to before me this

19th day of April, 2022



Christopher R. Neff
Notary Public, State of New York
Qualified in Kings County
Reg. No. 02NE6287085
Commission Expires Oct 12, 2025

CERTIFICATE OF SERVICE

I, Peter R. Ginsberg, certify that on April 19, 2022, this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF and paper copies will be sent to any indicated as non-registered participants.

/s/ Peter R. Ginsberg